

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

HAMAN, INC. d/b/a KNIGHTS INN,)
)
)
Plaintiff,)
) Civil Action File No.
) 2:18-cv-1534-KOB
v.)
)
CHUBB CUSTOM INSURANCE)
COMPANY,)
Defendant.)

PLAINTIFF'S EXHIBIT LIST

N O T O F E R E D	N U M B E R	I D E N T I F I E D	RULING ON OBJECTION (if any)	RULING ON REOFFER	R E C D. C O N D. OR L T D.	R E C E I V E D	Haman, Inc. v. Chubb Custom Ins. 2:18-CV-01534-KOB Trial Date: 7/19/2021
							PLAINTIFF – Gary V. Conchin, Kenneth B. Cole, Jr. Gregory Brockwell, Jason Smith
							DEFENDANT – Wayne Taylor, Michelle Sherman David Lee, Mark Hess
							COURT – Honorable Karon Owen Bowdre
							EXHIBIT LIST OF PLAINTIFF
							DESCRIPTION
	1						6/12/95 - Warranty Deed to Haman, Inc.
	2						Color picture before fire (all three buildings) (1 page)
	3 3A						2 aerial photographs showing building and lot dimensions
	4						Diagram of all three (3) buildings and rooms
	5						Pre-Fire Ballroom pictures (3 photos)
	6						WKFC Underwriting Manager's Inspection form
	7						Post-fire pictures (8 photos)
	8						Photo of fire scene (1 picture)
	9 9A						Chubb Custom Insurance Company Commercial Policy
							Appraisal Provision p. 9 policy
	10						4/15/14 - Perich – pictures

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EXHIBIT LIST OF PLAINTIFF												
			SUS	O/R	RES	SUS	O/R			DESCRIPTION		
11										4/15/14 - Lehman 20 pictures		
12										5/12/14 - Perich - Bushman pictures (pages 500-543)		
13										9/26/14 - Perich - Bushman pictures (pages 544-580)		
14										All pictures THG of the premises after the fire - (THG PX Bates 1-2264)		
15										Reduced summary of THG fire pictures (THG PX 1-81)		
16										Composite of current condition pictures		
17 17A										Current premises photos		
										Video of premises condition - Billy Hunt		
18										5/13/ 14 - Email Perich		
19										5/14/14 - E-mail Perich to Horne (Belfor)		
20										5/14/14 – 6/6/14 – Perich correspondence		

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COURT – Honorable Karon Owen Bowdre								
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			SUS	O/R	RES	SUS	O/R	DESCRIPTION
								5/13/14 - EDT Fortenberry - File Opening Form
21								5/30/14 - EDT Fortenberry - Report (11 pages)
22								
23								5/30/14 - Evans Garment Restoration Invoice
24								9/8/14 – Chubb's Burrell email
25								9/22/14 - Perich letter to Visram
26								Undated York Services Hilliard to Jeremy Elliott
27								9/22/14 – Letter Perich to Visram
28								9/22/14 - Letter Perich to Visram
29								10/1/14 -Email Perich to Elliott
30								SEA Report "Haman Smoke Damage Comparisons (5 pages)

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			SUS	O/R	RES	SUS	O/R		DESCRIPTION	
	31									10/14/14 – Jeremy Elliot to Hilliard re: Zarin
	32									12/23/14 and 12/29/14 -Perich to Zarin
	33									12/29/14 - Email Perich to Visram
	34									1/29/15 – Howarth (THG Client Information Sheet)
	34A									Redacted THG Appraisal Agreement
	35									1/29/15 – Complete Appraisal Employment Agreement THG
	36									2/11/15 - THG Report – (Fire loss 3/22/14)
	36A									THG Recap by Category – fire
	36B									Haman Structure Proof of Loss
	36C									6/2/21 – THG Updated Report (Fire loss 3/22/12)
	36D									6/2/21 – THG Recap by Category- Fire
	37									2/9/15 - Zarin to Perich
	38									2/23/15 - Visram letter to Perich
	39									02/25/2015 Letter from Howarth to Perich
	40									Howarth - Curriculum Vitae

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							DESCRIPTION
41							3/23/15 – Email from Perich to John/Jeremy
42							3/23/15 – Email from Howarth to Perich
43							3/24/15 – Letter from Perich to Howarth
44							3/25/15 Email from Howarth to Perich
45							04/16/15 Email from Perich to Howarth
46							4/16/15 -Email Perich to Bushman
47							04/17/15 -Email Howarth to Perich
48							04/17/15 Email from Perich to Howarth
49							Ala. Ins. Appraisal
50							4/17/2015 - YA Admin (Young) to Bushman, Lehman

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	51								4/16/15 – Perich to Bushman	
	51A								Belfor – THG Comparison Young & Associates	
	52								5/7/15 – File Note re: scope visit	
	53								5/11/15 – Email Perich re: admits expansion joint issue	
	54								5/12/15 – File Note Koos to Perich re: increasing scope	
	55								5/13/15 -Bushman appraisal for Perich, Chubb (\$523,477.01)	
	56								5/16/15 -Valuation reports – 5/6/15	
	57								(Undated) File Note Perich to Jeremy/ Hilliard	
	58								5/20/15 -Email Lehman to Bushman	
	59								6/1/15 -Email Perich to Grandinetti and Howarth	
	60								7/17/15 -Email Howarth to Perich	

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			SUS	O/R	RES	SUS	O/R		DESCRIPTION	
61									7/17/15 – File note to Koos	
62									7/20/15 – File note Koos	
63									7/22/15 Email from Perich to Bushman	
64									7/22/15 – Email from Bushman to Perich	
65									7/22/15 - Perich to Howarth	
66	66A								7/23/15 - Howarth to Perich	
									7/25/15 - Bushman named appraiser	
67									THG proposed three (3) umpires (2 pages)	
68									Dale Mullin curriculum vitae	
69									8/7/15 -Email Howarth to Bushman	
69A									8/17/15 – Perich to Bushman	
70									7/29/15 – Email Perich to Howarth	

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	71							08/20/2015 Email
	72							Handwritten note Sarah Grandinetti
	73							8/7/15 -Visram letter to Perich
	74							Sarah Grandinetti – fire contents inventory
	74A							Sarah Grandinetti – fire contents inventory (\$139,451.32)
	75							Haman Proof of Loss contents
	76							Sarah Grandinetti CV
	77							Arthur Grandinetti – CV
	78							8/10/15 –FBS Expert Report (18 pages)
	79							FBS Irmiter - Curriculum vitae (19 pages)
	80							FBS Irmiter – fire pictures – (IRM PX Bates 1-128)
								FBS Irmiter – picture of Black Mold- stachybotrys

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			SUS	O/R	RES	SUS	O/R	DESCRIPTION
	81							FBS Irmiter – picture of Chaetomium
	82							FBS Irmiter – picture of Aspergillus and Penicillium
	83							8/20/15 Email Perich to Bushman
	84							8/21/2015 – Email Howarth to Bushman
	85							8/21/15 – Declaration of Appraisers
	86							8/21/15 and 8/25/15 – Declaration of Appraisers
	87							9/3/15 – Email Perich to Zarin
	88							9/10/15 – Zarin Visram letter to Perich
	89							Resend of 9/10/15 Zarin letter to Perich
	90							10/1/15 – Email Howarth to Bushman

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			SUS	O/R	RES	SUS	O/R	DESCRIPTION
	91							10/21/15 – Email Howarth to Perich
	92							10/21/15 – Email Perich to Howarth
	93							10/22/15- Email Perich to Bushman
	94							10/22/15 – Email Perich to Bushman re: new, old contents claim
	95							Allen Contents List
	96							10/26/15 – Email Perich to Bushman
	97							11/13/15 – Paden & Paden
	97A							DANGER KEEP OUT SIGN
	98							12/1/15 – Email Wade Bushman to Perich
	99							12/4/15 - Email Perich to Wade Bushman,
	100							12/18/15 – Reservation of Rights

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	101							York Payment Ledger	
	102							12/18/15 – Letter Koos to Perich re: EUO and ROR – (2 pages)	
	103							Claims File – Notes	
	104							Perich First Report – April 16, 2014	
	105							Perich Second Report – May 23, 2014	
	106							Perich Third Report – July 21, 2014	
	107							Perich Fourth Report – September 2, 2014	
	108							Perich Fifth Report – October 19, 2014	
	109							Perich Sixth Report - November 26, 2014	
	110							Perich Seventh Report – December 26, 2014	

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			SUS	O/R	RES	SUS	O/R			DESCRIPTION		
111											Perich Eighth Report – January 30, 2015	
112											Perich Ninth Report – March 9, 2015	
113											Perich Tenth Report – April 25, 2015	
114											Perich Eleventh Report – June 4, 2015	
115											Perich Twelfth Report – July 17, 2015	
116											Perich Thirteenth Report – August 21, 2015	
117											Perich Fourteenth Report – October 2, 2015	
118										Perich Fifteenth Report- November 19, 2015		
119										1/10/16 Email Perich to Wade Bushman		
120											1/11/16 -Email Howarth to Perich	

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			SUS	O/R	RES	SUS	O/R			DESCRIPTION	
	121									1/11/16 -Butler Law Firm letter to Zarin	
	122									1/11/16 - Bushman to Howarth	
	123									1/12/2016 - Email Perich, Wade Bushman and Koos	
	124									1/19/16 - Butler Law Firm letter to Zarin	
	125									1/20/16 - Email Perich to Wade Bushman	
	126									1/20/16 -Email Perich to Wade Bushman and Koos	
	127									1/25/16 – Koos to Perich	
	128									1/27/16 Perich to Bushman	
	128A									1/30/16 Letter Bushman to Howarth	
	129									7/5/16 - Bushman to Luke Bowman	
	130									6/6/20 - Demolition estimate RC Enterprises \$457,500.00	

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	131									6/29/20 Demolition estimate Taco Stephens (\$443,500.00)	
	132									6/23/20 Demolition estimate Wise Excavation (\$448,476.97)	
	133									Wilburn p. 643, 644 (2 pages) - “Alabama”	
	134									Picture of Bushman	
	135									Picture of Perich	
	136									Howarth e-mails re: delays	
	137									Summary of Expert Witness fees as of 8/14/20	
	138									Partial Proof of Loss - Building	
	139									Partial Proof of Loss - BPP Contents	
	140									Fortenberry bills 5-30-2014 and 10/8/2015 (\$2,769.23 and \$5,709.55)	

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			SUS	O/R	RES	SUS	O/R			
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	141									Wade Bushman billing 6/15/15-11/24/15 (\$25,520.15)
	142									Steve Lehman billing – 6/12/15 – 1/13/16 (\$13,542.00)
	143									Brent Perich billing – 9/28/14 – 9/20/16 (\$19,850.11)
	144									Thomas Sumner billing – 12/8/15 – 2/16/16 (\$22,613.91)
	145									Stuart Mintz billing – 2/17/16 (\$3,987.05)
	146									Paul Defay billing - 10/31/14 (\$4,176.88)
	147									Chubb, York Risk Services, Young & Associates diagram
	148									BBMK estimate 5-20-14
	149									Belfor estimate 5-30-14
	150									Brookstone estimate 7-14-14

Respectfully submitted this the 21st day of June, 2021.

/s/ Gary V. Conchin
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CERTIFICATE OF SERVICE

I certify that I have on the 21st day of June, 2021 served a true and correct copy of the foregoing to counsel for all parties in this matter via electronic mail using the federal online filing system for this District.

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